IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

AMERICAN SAFETY CASUALTY	§	
INSURANCE COMPANY,	§	
Plaintiff,	§	
	§	
	§ CIVII	ACTION NO. 4:16-CV-345
VS.	§ JURY	TRIAL DEMANDED
	§	
SAN JACINTO COUNTY, TEXAS,	§	
Defendant.	§	

MOTION TO DISMISS FOR IMPROPER VENUE, FOR LACK OF SUBJECT MATTER JURISDICTION, AND PURSUANT TO THE DECLARATORY JUDGMENT ACT

Larry J. Simmons – Attorney-in-Charge State Bar No. 00789628 Southern District of Texas No. 18830 B. Eliot New – Of Counsel State Bar No. 24060328 Southern District of Texas No. 884608 GERMER PLLC P.O. Box 4915 Beaumont, TX 77704 (409) 654-6700 – Telephone (409) 835-2115 – Facsimile

COUNSEL FOR DEFENDANT, SAN JACINTO COUNTY, TEXAS